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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

POWER PROBE GROUP, INC.,

Plaintiff/Counter-Defendant,

vs.

INNOVA ELECTRONICS
CORPORATION,

Defendant/Counterclaimant.

Case No: 2:21-cv-00332-GMN-EJY

**FIRST AMENDED COMPLAINT FOR
PATENT INFRINGEMENT**

1 Plaintiff Power Probe Group, Inc. (hereinafter “Power Probe” or “Plaintiff”), in support of
2 this First Amended Complaint against Defendant Innova Electronics Corporation (hereinafter
3 “Innova Electronics” or “Defendant”) does hereby allege as follows:

4 **NATURE OF THE ACTION**

5 1. Plaintiff brings this action for patent infringement of United States Patent No.
6 7,184,899 (**Exhibit 1**) pursuant to the Patent Act, 35 U.S.C. § 101, *et seq.*, and include claims for
7 damages (including treble damages), injunctive relief, costs, and attorneys’ fees under §§ 154, 281,
8 283-285 of that Title.

9 **THE PARTIES**

10 2. Plaintiff Power Probe Group, Inc. is a Delaware corporation with its registered
11 address at 651 North Broad Street, Suite 206, Middletown, Delaware 19709. Via a certificate of
12 merger, filed with the Delaware Secretary of State: Division of Corporations on March 31, 2021,
13 Plaintiff Power Probe Group, Inc. was designated as the “surviving corporation” of a merger with
14 Power Probe Tek, LLC, formerly the exclusive licensee of the ’899 Patent, and formerly a named
15 Plaintiff in this action.

16 3. Power Probe is dedicated to the creation of innovative, easy to use diagnostic
17 equipment for the automotive industry. Power Probe strives to meet the increasingly complex
18 needs of today’s automotive technician.

19 4. Power Probe is a leader in providing electrical circuit testers to the automotive
20 industry. Power Probe’s products provide users with a multitude of testers at their fingertips.

21 5. Power Probe’s products are designed in the United States and have been
22 manufactured in the United States as well as in other countries.

23 6. Defendant Innova Electronics Corporation is a Nevada corporation with a
24 registered address at 3773 Howard Hughes Parkway, Suite 500S, Las Vegas, Nevada 89169. The

1 listed address for Defendant's officers is 375 North Stephanie Street, Suite 1411, Henderson,
2 Nevada 89014. **Exhibit 2**.

3 7. According to its website, Defendant is a "supplier of test equipment and diagnostic
4 reporting for the automotive aftermarket." **Exhibit 3**.

5 8. One such product is the Innova PowerCheck #5420 (hereinafter the "PowerCheck
6 #5420" or "Accused Product"). Defendant offers the Accused Product for sale on its website,
7 **Exhibit 4**, and offers nationwide shipping, including to this District. **Exhibit 21**. The Accused
8 Product is also available for sale at or through various retail stores, including AutoZone®, O'Reilly
9 Auto Parts®, and NAPA® stores, **Exhibit 5**; including retail locations in this District. *E.g.*,
10 **Exhibit 18** through **Exhibit 20**.

11 **JURISDICTION AND VENUE**

12 9. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§
13 1331 and 1338(a) and (b) both because it involves a federal question and also because it involves
14 patents.

15 10. Because the amount in controversy exceeds \$75,000, and because Plaintiff and
16 Defendant are diverse parties, this Court also has original jurisdiction pursuant to 28 U.S.C. §
17 1332.

18 11. This Court has *in personam* jurisdiction over Defendant because Innova Electronics
19 Corporation is incorporated in this state, conducts business in this district, and is engaged in patent
20 infringement in this district.

21 12. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400
22 because Defendant is registered in this district, its officers have a listed address in this district,
23 because Defendant conducts business in this district, and because a substantial part of the events
24

1 giving rise to Power Probe's claims occurred in this district, namely Defendant's making, using,
2 selling, and/or offering to sell and distribute products that infringe the Asserted Patent.

3 **FACTUAL BACKGROUND AND GENERAL ALLEGATIONS**

4 *The '899 Patent*

5 13. Power Probe, as owner of the '899 Patent, holds all title to, interest in, and have
6 standing to sue for infringement—including past infringement—of United State Patent No.
7 7,184,899 (hereinafter "the '899 Patent" or "Patent-in-Suit") entitled "Energizable Electrical Test
8 Device For Measuring Current And Resistance Of An Electrical Circuit," which issued on
9 February 27, 2007. **Exhibit 1.**

10 14. The '899 Patent has one named inventor, Randy Cruz. Mr. Cruz invented a new
11 and useful energizable electrical test device for measuring the current and resistance of an electrical
12 circuit and filed a United States application, Application No. 11/029,595, (hereinafter the "'595
13 Application") directed thereto, on January 5, 2005.

14 15. The '899 Patent generally relates to an electrical test device adapted to apply power
15 to and perform a plurality of measurements upon an electrical system.

16 16. The '899 Patent describes various needs in the prior art including but not limited to
17 (1) the need in the art for an electrical test device that is capable of providing power to an electrical
18 system in order to test such electrical system in the active or powered state; (2) the need in the art
19 for an electrical test device that combines other test features such as logic probe diagnostic testing
20 into a single unit; (3) the need in the art for an electrical test device capable of combining key
21 measurement functions into a single instrument in order to the accelerate diagnosis of electrical
22 problems; and (4) the need in the art for an electrical test device that is hand held, and that is easy
23 to use and which contains a minimal number of parts and is of low cost.

1 17. The Patent Office issued the '899 Patent as shown in **Exhibit 1**, with twenty-seven
2 (27) claims.

3 18. Exemplary Independent Claim 1 of the '899 Patent is directed to:

4 An electrical test device having multimeter functionality and being adapted to
5 provide current sourcing to an electrical system for selective measurement of a plurality of
6 parameters thereof in at least one of powered and unpowered states, the electrical test
7 device comprising:

8 a conductive probe element configured to be placed into contact with the electrical
9 system and provide an input signal thereto;

10 a power supply interconnected between an external power source and the probe
11 element;

12 a processor electrically connected to the probe element and configured to
13 manipulate the input signal provided to the electrical system and receive an output signal
14 in response to the input signal, the output signal being representative of at least one of the
15 parameters of the electrical system; and

16 a display device electrically connected to the processor and configured to display a
17 reading of the output signal, the reading being representative of the parameter;

18 wherein the electrical test device is configured to allow for selective powering of
19 the electrical system upon energization of the probe element during measurement of the
20 parameters.

21 19. In the context of the '899 Patent, if you wanted to measure continuity, you could.
22 *See, e.g.*, ECF No. 98, pg. 32.

23 20. In the context of the '899 Patent, a multimeter could be used to measure continuity.
24 *See, e.g.*, ECF No. 98, pg. 29.

21. In the context of the '899 Patent, detection is binary. *See, e.g.*, ECF 99, pg. 88-89.

22. The '899 Patent was originally assigned to Power Probe, Inc., and was subsequently assigned to Power Probe Group, Inc. **Exhibit 6**.

23. The First, Second and Third Maintenance Fees for the '899 Patent have been paid. **Exhibit 7**.

24. The '899 Patent is valid and enforceable.

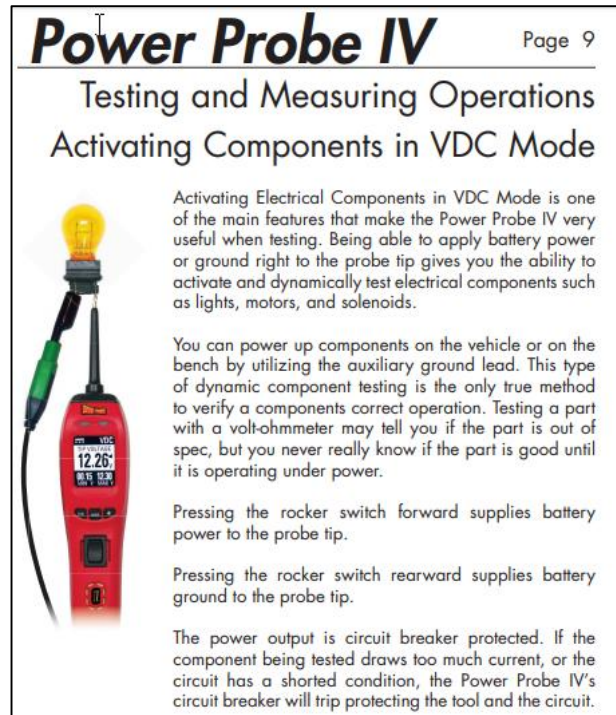
The Power Probe Products

25. Power Probe distributes a variety of electrical system test devices including the 'Power Probe III,' 'Power Probe 3EZ,' 'Power Probe IV,' 'The Hook,' and 'The Maestro' (collectively the "Representative Power Probe Products"). Each of the Representative Power Probe Products has the "capability of applying battery-supplied voltage or ground," *e.g.*, **Exhibit 8** at 4, 8, 10, 11, and to display voltage and continuity; *see also* **Exhibit 9** through **Exhibit 13**.

26. Power Probe marks its products in accordance with 35 U.S.C. § 287. For instance, as shown below, the Power Probe III is marked with the '899 Patent:



27. By way of example, each of the Representative Power Probe Products comprises an electrical test device having multimeter functionality and being adapted to provide current sourcing to an electrical system for selective measurement of a plurality of parameters thereof (e.g., voltage, continuity) in at least one of the powered and unpowered states. *E.g.*, **Exhibit 12** at 9 (excerpted below); *see also* **Exhibit 9** through **Exhibit 13**.



The Accused Products

28. Defendant has previously and is presently making, using, selling, offering for sale, and/or importing into the United States, including in this district, products that infringe the '899 Patent. These products include certain car electrical system diagnostic tools known as the Innova PowerCheck #5420 (hereinafter the "PowerCheck #5420" or "Accused Product").

29. According to Defendant, "[t]he Innova 5420 PowerCheck attaches to your vehicle's battery or auxiliary power outlet, allowing you to supply voltage or ground to activate and test components, in or around your vehicle." **Exhibit 4**.



30. The Accused Product was launched recently, around November 2020. **Exhibit 14**, **Exhibit 15**.

31. Defendant advertises the Accused Product for sale on its website, <https://www.innova.com/product/detail/5420/PowerCheck>. **Exhibit 4**. Defendant's "Find In Store" webpage also identifies various retail locations at which the Accused Product is allegedly offered for sale, including locations in this district. **Exhibit 5**; *see also* **Exhibit 18** through **Exhibit 20**. Defendant offers to sell the Accused Product to customers in Nevada and to ship the Accused Product to customers in Nevada. *E.g.*, **Exhibit 21**.

32. On information and belief, Defendant advertises the Accused Product on its website as having a "patented swivel head" (**Exhibit 4**) though Defendant does not currently own any issued U.S. Patents relating to the Accused Product.

33. In fact, Defendant has already sold the Accused Product to at least one customer in Nevada and therefore shipped the Accused Product into this District. *E.g.*, **Exhibit 23**.

Irreparable Harm to Power Probe

34. Defendant's conduct has already caused irreparable harm to Power Probe and will continue to cause further irreparable harm unless Defendant is enjoined from further acts of infringement. *See, e.g.*, ECF No. 36 (Motion for Preliminary Injunction) and supporting evidence.

35. In light of the exclusivity afforded to it by virtue of the '899 Patent, the Representative Power Probe Products have faced little to no competition in recent years, allowing Power Probe to focus its attention on improving other features of its business such as procurement,

1 customer service, marketing, as well as ramping up its research and development efforts with a
2 goal to accelerate the launch of future iterations of its products.

3 36. In furtherance of its efforts to retain exclusivity and to focus on the aforementioned
4 activities, Power Probe has never licensed the '899 Patent to any non-Power Probe person or entity,
5 let alone to a direct competitor. Power Probe has continuously demonstrated its intent to retain
6 exclusivity through the life of the '899 Patent.

7 37. The recent disruption caused by Defendant—an unlawful market entrant and
8 participant—threatens to cause an unquantifiable and irreversible amount of harm to Power
9 Probe's market share as well as to the quality and speed-to-market of its future products.

10 38. Power Probe and Defendant are direct competitors and compete for the same
11 customers (*e.g.*, automobile owners, mechanics) in the same geographic markets, including in this
12 District, in what is essentially now a two-player market following Defendant's unlawful entrance
13 into this market. Moreover, both the Representative Power Probe Products and the Accused
14 Product are offered for sale through the same distribution channels and even through the same
15 retail stores (*e.g.*, AutoZone®, O'Reilly Auto Parts®, and NAPA®).

16 39. Under the patent system, Power Probe is entitled to exclusivity through the life of
17 the '899 Patent; its business plan is predicated on this exclusivity. Any further disruption from
18 Power Probe's current operations in order to distinguish itself from and otherwise compete with
19 Defendant will cause further irreparable harm to Power Probe.

20 40. Defendant's unlawful entry into the market further threatens to cause irreparable
21 harm to Power Probe's reputation and goodwill, as well as create irreversible price erosion—the
22 Accused Product sells for significantly less than the Representative Power Probe Products. *E.g.*,
23 compare **Exhibit 22** (Power Probe III, \$142.95), with **Exhibit 4** (PowerCheck #5420, \$79.99).

1 **Exhibit 25.** The law firm of Stetina, Brunda, Garred & Brucker participated in prosecuting the
2 '899 Patent and is identified throughout the prosecution history of the '899 Patent. *See, e.g.*, ECF
3 No. 37-3, pgs. 9, 11, 13, 18, 37, 38, 53, 84, 85, 113.

4 49. Mr. James Yang also worked at the law firm of Stetina, Brunda, Garred & Brucker
5 between 2005 and 2007. **Exhibit 27.**

6 50. Between 2005 and 2007, Mr. Brunda and Mr. Yang had access to the file relating
7 to the '899 Patent and its prosecution history, either electronically or a hard copy thereof.

8 51. Mr. Yang and Mr. Brunda are listed as "Authors" of an "Assessment of
9 noninfringement" email correspondence dated August 6, 2019, relating to the '899 Patent, and Mr.
10 Yang is listed as the "Author" of a "Letter" dated August 6, 2019 relating to "Assessment of
11 noninfringement" relating to the '899 Patent. *See* **Exhibit 26**, pg. 10.

12 52. On information and belief, Defendant had knowledge of the '899 Patent no later
13 than August 6, 2019, based on Defendant having identified allegedly privileged emails and letters
14 relating to "Assessment of noninfringement," believed to be referring to the '899 Patent. **Exhibit**
15 **26**, pg. 10.

16 53. Defendant developed, tested, and launched the Accused Product despite its
17 knowledge of the '899 Patent and despite an objectively high likelihood that its conduct constituted
18 infringement of a valid U.S. Patent. *See, e.g.*, ECF No. 79-12.

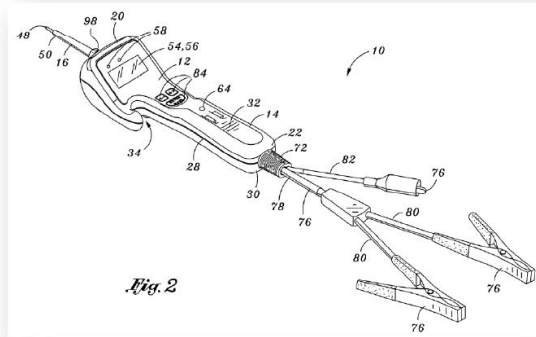
19 **COUNT I – WILLFUL INFRINGEMENT OF THE '899 PATENT**

20 ***35 U.S.C. §271***

21 54. Plaintiff hereby incorporates paragraphs 1 - 53 above as if fully set forth herein.

22 55. Defendant has directly infringed and continues to directly infringe at least Claims
23 1, 4-10, 12 and 13 of the '899 Patent through making, using, selling, distributing and/or offering
24

to sell and distribute the Accused Product in the United States, both literally and under the doctrine of equivalents.



'899 Patent, Fig. 2



Innova PowerCheck #5420

56. Defendant has willfully infringed and continues to willfully infringe the '899 Patent. Despite its knowledge of the '899 Patent, Defendant has sold and continues to sell the Accused Product in complete and reckless disregard of Power Probe's patent rights.

57. By way of example, the Accused Product comprises an electrical test device having multimeter functionality and being adapted to provide current sourcing to an electrical system for selective measurement of a plurality of parameters thereof in at least one of powered and unpowered states, the electrical test device comprising:

PowerCheck #5420

\$79.99

The Innova 5420 PowerCheck attaches to your vehicle's battery or auxillary power outlet, allowing you to supply voltage or ground to activate and test components, in or around your vehicle. Test switches, relays, fans, pumps, lighting, and more on passenger and heavy-duty vehicles.

Exhibit 4

- a conductive probe element configured to be placed into contact with the electrical system and provide an input signal thereto (e.g., the Accused Product comprises a conductive "probe"

element, *see* **Exhibit 16**, which may be placed into contact with, *e.g.*, “switches, relays, fans, pumps, lighting, and more on passenger and heavy-duty vehicles,” **Exhibit 4**;



Exhibit 4

- a power supply interconnected between an external power source and the probe element (*e.g.*, the Accused Product comprises a power supply interconnected between “your vehicles battery or auxiliary power outlet” (**Exhibit 4**) and the probe element);
- a processor electrically connected to the probe element and configured to manipulate the input signal provided to the electrical system and receive an output signal in response to the input signal, the output signal being representative of at least one of the parameters of the electrical system (*e.g.*, the Accused Product allows for “Voltage/Ground Check” as well as “Continuity Test,” **Exhibit 16**); and
- a display device electrically connected to the processor and configured to display a reading of the output signal, the reading being representative of the parameter (*e.g.*, the Accused Product comprises a “built-in display” to display, *e.g.*, voltage or continuity (**Exhibit 4**; *see also* INNOVA 001386));



Exhibit 4

- wherein the electrical test device is configured to allow for selective powering of the electrical system upon energization of the probe element during measurement of the parameters (*e.g.*,

1 the Accused Product “allow[s] you to supply voltage or ground to activate and test components,
2 in or around your vehicle,” **Exhibit 4**). *See also* ECF Nos. 37, 60.

3 58. Alternatively, based on its proposed constructions of the disputed terms (*see* ECF
4 No. 94-1), Defendant infringes under the doctrine of equivalents.

5 59. For the example, to the extent that the Court adopts Defendant’s proposed
6 construction for any of “processor,” “measurement,” “electrical system,” “input signal,” “output
7 signal,” “reading,” or “keypad,” the Accused Product would still satisfy the corresponding
8 limitations under the doctrine of equivalents.

9 60. On information and belief, Defendant has used the Accused Product in
10 demonstration of the device, and/or during research, development, design, and/or testing. *E.g.*,
11 **Exhibit 5** (“all Innova products are researched, developed and designed at the company’s
12 headquarters in Irvine, Calif” and “our engineers perform rigorous testing on-site at our state-of-
13 the-art facilities”).

14 61. As a result of Defendant’s willful patent infringement, Power Probe has suffered
15 and will continue to suffer irreparable harm.

16 62. Defendant’s infringement of the ’899 Patent has injured and continues to injure
17 Power Probe in an amount to be proven at trial, but no less than a reasonable royalty.

18 **PRAYER FOR RELIEF**

19 WHEREFORE, Plaintiff Power Probe Group, Inc., by and through the undersigned, hereby
20 respectfully asks the Court to enter judgment against Defendant Innova Electronics Corporation
21 and their respective subsidiaries, affiliates, agents, servants, employees, and all persons in active
22 concert or participation with them, granting the following relief:

23 A. An entry of judgment holding that Defendant has infringed and is infringing the
24 Patent-in-Suit;

1 B. An entry of judgment that Defendant's infringement has been and continues to be
2 willful;

3 C. A preliminary injunction against Defendant and all those acting in concert with
4 Defendant, from making, using, selling, or offering to sell the Accused Product and all colorable
5 imitations thereof;

6 D. A permanent injunction against Defendant and all those acting in concert with
7 Defendant, from making, using, selling, or offering to sell the Accused Product and all colorable
8 imitations thereof;

9 E. An award to Power Probe for the full amount of damages sustained, including but
10 not limited to, any and all damage remedies available pursuant to the patent laws of the United
11 States, including but not limited to lost profits, a reasonable royalty award, pre-judgment interest,
12 post judgment interest, and treble damages.

13 F. A finding that this case is exceptional and an award to Power Probe of its costs and
14 reasonable attorneys' fees, as provided by 35 U.S.C. § 285; and

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G. Such further and additional relief this Court deems just and proper under the circumstances.

DATED this 8th day of December, 2021.

HOLLEY DRIGGS

/s/ James D. Boyle

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Attorneys for Plaintiff Power Probe Group, Inc.

INDEX OF EXHIBITS

<u>EXHIBIT</u>	<u>DESCRIPTION</u>
1.	U.S. Patent No. 7,184,899
2.	Secretary of State Business Record for Innova Electronics Corporation
3.	Screenshot of Innova Electronics' "About Us" webpage located at https://www.innova.com/home/about-us , last visited 01/22/2021
4.	Screenshot of Innova Electronics' "5420 PowerCheck" webpage located at https://www.innova.com/product/detail/5420/PowerCheck , last visited 01/22/2021
5.	Screenshot of Innova Electronics' "Find in Store" webpage located at https://www.innova.com/home/find-in-store , last visited 1/22/2021
6.	Assignment Abstract of Title for U.S. Patent No. 7,184,899
7.	Patent Maintenance Fee Record for U.S. Patent No. 7,184,899
8.	Power Probe Product Catalog
9.	Power Probe Instruction Manual
10.	Power Probe 3EZ Manual
11.	Power Probe IV Users Manual
12.	Power Probe Hook Operations Manual
13.	Power Probe Pro Series The Maestro Operations Manual
14.	Screenshot of Innova Electronics' "Innova Launches 5420 Power Check Circuit Tester" webpage located at https://www.autoserviceprofessional.com/articles/8600-innova-launches-5420-power-check-circuit-tester , last visited 01/22/2021
15.	Screenshot of After Market News' webpage featuring Innova Electronics' 5420 Power Check located at https://www.aftermarketnews.com/innova-introduces-powered-circuit-tester , last visited 01/22/2021
16.	Innova Electronics' Power Check 5420 Quick Start Guide
17.	Screenshot of Innova Electronics' "Support" webpage located at https://www.innova.com/support

18. Screenshot of AutoZone webpage listing of Nevada locations offering Innova Electronics' Accused Product for sale located at https://autozone.com/test-scan-and-specialty-tools/circuit-tester/innova-circuit-tester/1056640_0_0, last visited 01/26/2021
19. Screenshot of webpage listing O'Reilly Auto Parts locations in Las Vegas, Nevada located at <https://www.oreillyauto.com/locations/nv/las-vegas>, last visited 02/8/2021
20. Screenshot of webpage listing Napa Nevada locations offering Innova Electronics' Accused Product for sale located at https://napaonline.com/en/p/BK_7000121, last visited 01/26/2021
21. Screenshot of Innova Electronics' Order Summary offering to ship Accused Product to Nevada dated 01/25/2021
22. Screenshot of webpage offering Power Probe 3 for sale available at <https://www.pp-tek.com/store/product/power-probe-3/>, last visited 01/25/2021
23. Innova Electronics' Packing Slip for the Accused Product dated 01/26/2021
24. U.S. Patent Application No. 16/712,893, entitled "Electrical Probe," published as US 2021/0181239 and assigned to Innova Electronics Corporation
25. LinkedIn Profile for Mr. Bruce Brunda, preserved on October 12, 2021, available at <https://www.linkedin.com/in/bruce-brunda-17a470169/>
26. Defendant Innova Electronics Corporation's First Supplement to Initial Disclosure of Documents and Witnesses Pursuant to FRCP 26(a)(1), dated July 19, 2021, including "Privilege Log" attached thereto.
27. LinkedIn Profile for Mr. James Yang, preserved on October 12, 2021, available at <https://www.linkedin.com/in/jamesyangpatentjd/>

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of December, 2021, and pursuant to Fed. R. Civ. P. 5 and LR IA 10-5(c), I served the foregoing **FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT** on the following counsel as follows:

Attorneys of Record	Party Represented	Method of Service
Craig R. Anderson, Esq. Jared M. Moser, Esq. MARQUIS AURBACH COFFING 10001 Park Run Drive Las Vegas, Nevada 89145	Defendant and Counterclaimant Innova Electronics Corporation	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Federal Express
Kenneth R. Adamo, Esq. Law Office of KR Adamo 360 West Illinois, Apt. 620 Chicago, IL 60654	Defendant and Counterclaimant Innova Electronics Corporation	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Federal Express
Richard P. Beem, Esq. Alex Shtraym, Esq. 53 W. Jackson Blvd., Suite 1352 Chicago, Illinois 60604	Defendant and Counterclaimant Innova Electronics Corporation	<input type="checkbox"/> Personal Service <input checked="" type="checkbox"/> Email/E-File <input type="checkbox"/> Fax Service <input type="checkbox"/> Federal Express

/s/ Kathy MacElwain

An employee of Holley Driggs